

217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Caterpillar, Inc. Technical Center
Attn.: Patricia A. Ludewig
1311 East Cedar Hills Drive
Mossville, Illinois 61552

<u>Application No.:</u> 95120015	<u>I.D. No.:</u> 143810AAD
<u>Applicant's Designation:</u>	<u>Date Received:</u> December 4, 1995
<u>Operation of:</u> Research, development, and testing of diesel engines	
<u>Date Issued:</u> March 18, 2002	<u>Expiration Date</u> ² : March 18, 2007
<u>Source Location:</u> 1311 East Cedar Hills Drive, Mossville, Peoria County	
<u>Responsible Official:</u> Sherril West, Vice President of Technical Services Division	

This permit is hereby granted to the above-designated Permittee to OPERATE a diesel engine research and development center, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: April 16, 2003
Revision Date Issued: TO BE DETERMINED
Purpose of Revision: Minor Modification

This minor modification is being made to correct the permit for the correct emission factors, which were included in the original permit application and are based on facility engineering data from the test cell engines.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supercedes those terms and conditions of the permit for which the conflict exists. The previous permit issued March 18, 2002 is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

If you have any questions concerning this permit, please contact LeeAnne Kinsella at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:LAK:psj

cc: Illinois EPA, FOS, Region 2
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit.

² Except as provided in condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Caterpillar, Inc. Technical Center
1311 E. Cedar Hills Drive
Mossville, Illinois 61552
309/578-2209

I.D. No.: 143810AAD
Standard Industrial Classification: 3531, Construction Machinery
and Equipment

1.2 Owner/Parent Company

Caterpillar, Inc.
100 NE Adams St.
Peoria, Illinois 61629

1.3 Operator

Caterpillar, Inc. Technical Center
1311 E. Cedar Hills Drive
Mossville, Illinois 61552

Patricia A. Ludewig, Environmental Health and Safety Services
Environmental Supervisor
309/578-6418

1.4 General Source Description

The Caterpillar, Inc. Technical Center is located at 1311 E. Cedar Hills Drive in Mossville. The source conducts research and development (R&D) activities relating to diesel fueled engines. In addition, some manufacturing process related work is also conducted at this source.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AIRS	Aerometric Information Retrieval System Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (EPA-450/4-90-003), USEPA, Technical Support Division Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
FIRE	Factor Information Retrieval System, Version 5.0, Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (EPA-454/R-95-012), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ft ³	cubic foot
gal	gallon
HAP	Hazardous Air Pollutants
hr	hour
hp	horsepower
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
kW	kilowatt
l	liter
lb	pound
LPG	Liquefied Petroleum Gas
m ³	cubic meter
Mft ³	Million cubic feet
Mg	Metric Tonnes or Megagrams
mmBtu	Million British thermal units
mo	month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration

RMP	Risk Management Plan
SCC	Source Classification Code
scf	standard cubic feet
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
T	Ton
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
TANKS	USEPA Emission Estimating Program for Storage Tanks
USEPA	United States Environmental Protection Agency
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
wt.	Weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) (1) and 201.211, as follows:

500 Gallon Methanol Tanks
500 Gallon Ethanol Tanks
3,175 Gallon Methanol Tanks

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a) (2) or (a) (3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a) (4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a) (4)].

Furnaces used for melting metals, other than beryllium, with a brim full capacity of less than 450 cubic inches by volume [35 IAC 201.210(a) (6)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a) (10)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a) (11)].

Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
H-Pad	H-Pad Engines (Natural Gas/Diesel Fuel-Fired Engine Test Cells)	1966	None
P-001	Paint Operation - Building K (Main Paint Booth)	1969	Paint Filter C-001
P-006	Mig Welding Operation of Metal Parts	1969	None
P-007	Gasoline Tank #8 (10,080 gallons)	Prior to 1960	None
P-008	Pangborn Corporation Model 140-2RG-3 Rotoblast Table	1969	Dust Collector C-008
Peak Shavers	Two 2,144 hp and One 1,420 hp Diesel-Fired Reciprocating Engines/Generators	1986	None
TCF TCL TCL Wing 5	109 Diesel Engine Test Cells (Natural Gas/Diesel Fuel-Fired Engines)	1962 1961 1982	None
TCF and TCL Alternative	10 Alternative Fuel Test Cells	1962	None
TCG	Fifteen (15) Diesel Engine/Turbine Powered Component Test Cells	1971	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of CO, NO_x, SO₂, and HAP emissions.
- 5.1.2 For purposes of the CAAPP, Caterpillar, Inc. Technical Center is not considered as a single source with Caterpillar, Inc. Mossville Engine Center, I.D. No. 143810AAB, located at Cedar Hills Drive and Old Galena Road in Mossville. The primary activity performed at Caterpillar, Inc. Technical Center is research and development. Therefore, this source is considered a stand alone research and development facility.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- 5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

- 5.3.1 This permit is issued based on the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the source does not have a pollutant-specific emissions unit that uses an add-on control device to achieve compliance with an emission limitation or standard.

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO _x)	452.9
Particulate Matter (PM)	20.0
Sulfur Dioxide (SO ₂)	106.8
Volatile Organic Material (VOM)	82.2
HAP, not included in VOM or PM	-----
Total	661.9

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

N/A

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit P-001: Coating Operations Control C-001: Paint Filters

7.1.1 Description

The vast majority of coating done at this location is maintenance related. Some manufacturing process related work is conducted using the paint booth located in Building K.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
P-001	Paint Operation - Building K (Main Paint Booth)	Paint Filter C-001

7.1.3 Applicability Provisions and Applicable Regulations

- a. The Main Paint Booth is an "affected coating line" for the purpose of these unit-specific conditions.
- b. The affected coating line is subject to the emission limits identified in Condition 5.2.2.
- c. The affected coating line is subject to 35 IAC 212.321(a), which provides that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].
 - ii. Because the expected process weight rate for each affected coating line is less than 100 pounds per hour, the allowable PM emission rate for each affected coating line set by 35 IAC 212.321 is 0.55 pounds per hour.
- d. Pursuant to 35 IAC 215.204, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds

which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Pursuant to 35 IAC 215.204(k)(2), the emission limitations for Heavy Off-Highway Vehicle Products coating in the remaining counties (excluding Macoupin County) are as follows:

i. Extreme performance prime coat:

kg/l	lb/gal
0.42	3.5

ii. Extreme performance top coat-air dried:

kg/l	lb/gal
0.52	4.3

iii. Final repair coat-air dried:

kg/l	lb/gal
0.58	4.8

- e. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall only apply to photochemically reactive material [35 IAC 215.301].

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected coating line is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM₁₀, as identified in 35 IAC 212.324(a)(1).
- b. i. No owner or operator of a coating line subject to the limitations of 35 IAC 215.204 is required to meet the limitations of 35 IAC 215.301 or 215.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 215.204 [35 IAC 215.209].
- ii. The exemption from Condition 7.1.3(e) (see also 35 IAC 215.301) specified in Condition 7.1.4(b)(i) (see also 35 IAC 215.209) does not

apply when the affected coating line is being used for maintenance related purposes.

iii. The affected coating line is not subject to the limitations specified in Condition 7.1.3(d) (see also 35 IAC 215.204) when the affected coating line is being used for maintenance related purposes.

c. This permit is issued based on the affected coating line not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating line does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.1.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the paint booth filters, including periodic inspection, routine maintenance and prompt repair of defects.

7.1.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.1.7 Testing Requirements

a. The VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. For printing inks, the volatile organic material content shall be determined by Method 24A, 40 CFR Part 60, Appendix A. Any alternate test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative [35 IAC 215.208(a)].

- b. Transfer efficiency shall be determined by a method, procedure or standard approved by the USEPA, under the applicable new source performance standard or until such time as USEPA has approved and published such a method, procedure or standard, by any appropriate method, procedure or standard approved by the Illinois EPA [35 IAC 215.208(b)].
- c. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected coating lines shall be determined as follows:
 - i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.105.
 - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(c)(ii) directly reflect the application of such material and separately account for any additions of solvent.

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with Conditions 5.5.1 and 7.1.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.1.7, which include the following [Section 39.5(7)(e) of the Act]:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.

- b. The owner or operator of the coating plant shall maintain records of the density of the volatile organic material in each coating, the quantity and volatile organic material and solids content of each coating applied and the line to which coating is applied, in such a manner so as to demonstrate continuing compliance with the combined allowable emissions [35 IAC 215.207(d)].
- c. Pursuant to 39.5(7)(e) of the Act, the Permittee shall collect and record all of the following information each day for the affected coating lines and maintain the information at the source for a period of five years:
 - i. The name and identification number of each coating as applied on each coating line; and
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
 - iii. Identification of the substrate to which the coating is applied and whether the coating is being applied for "maintenance" or "manufacturing" purposes.
- d. Records addressing use of good operating practices for the paint booth filters:
 - i. Records for periodic inspection of the spray booth filters with date, individual performing the inspection, and nature of inspection; and
 - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. Coating usage of the affected coating lines, gal/mo and gal/yr;
- f. VOM content of coatings, % by Wt;
- g. Density of coatings, lb/gal;
- h. Cleanup solvent usage, gal/mo and gal/yr;
- i. Density of solvent, lb/gal; and
- j. The operating schedule of the affected coating lines; and

- k. The aggregate monthly and annual PM and VOM emissions from the affected coating lines based on the coating and solvent usage, the VOM content of such materials, the operating schedule and the typical hourly emission rate, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected coating line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Pursuant to Section 39.5(7)(f) of the Act, the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3(d) (see also 35 IAC 215.204) within 30 days following the occurrence of the violation.
- b. Continued operation of an affected coating line with a defect in a paint booth filter that may result in emissions of particulate matter in excess of limits in Conditions 7.1.3(b) or (c) within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

- a. Compliance with Conditions 7.1.3(b) and (c) is assumed by proper operation of the spray booth filters, as addressed by Conditions 7.1.5 and 7.1.9(d).
- b. To determine compliance with Conditions 5.5.1 and 7.1.3, PM and VOM emissions from the affected coating lines shall be calculated based on the following:

- i. Volatile Organic Material Emissions:

VOM (lb) = [(Coating Usage, gal) x (Coating Density, lb/gal) x (VOM Content of Coating, % by Wt.)] + [(Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal)]

ii. Particulate Matter Emissions:

$$\begin{aligned} \text{PM (lb)} &= (\text{Wt of Coating Used, lb}) \times (\text{Wt \% Solids}) \times [1 - (\text{Transfer Efficiency}^* (\%)/100)] \\ &\times [1 - (\text{Spray Booth Filter Efficiency}^* (\%)/100)] \end{aligned}$$

* As specified by manufacturer or vendor of the spray booths and filters

7.2 Units Test Cells & H-Pad: Diesel Engine/Component Testing

7.2.1 Description

The diesel engine test cells and the H-Pad engines, which are also engine test cells, are used to test both diesel and natural gas-fired engines for research and development. There are 134 engine test cells at this source, of that number 108 of these test cells are for engines with a rated power output of up to 1,200 hp and the remaining 26 test cells are for engines with a rated power output up to 5,000 hp. Fifteen of the engine test cells are used to test components for diesel engines or turbines. The engines/turbines burn primarily diesel fuel but may also burn natural gas or propane.

The source utilizes ten engine test cells for alternative fuel testing (alternative being anything other than diesel, natural gas or propane). These cells are specifically set aside for research activities and include atypical testing apparatus such as single-cylinder engines. They are operated infrequently and consume low volumes of fuel.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
H-Pad	H-Pad Engines (Natural Gas/Diesel Fuel-Fired Engine Test Cells)	None
TCF TCL TCL Wing 5	109 Diesel Engine Test Cells (Natural Gas/Diesel Fuel-Fired Engines)	None
TCF and TCL Alternative	10 Alternative Fuel Test Cells	None
TCG	Fifteen (15) Diesel Engine/Turbine Powered Component Test Cells	None

7.2.3 Applicability Provisions and Applicable Regulations

- The Test Cells and the H-Pad Engines are "affected engine test cells" for the purpose of these unit-specific conditions.
- Each affected engine test cell is subject to the emission limits identified in Condition 5.2.2.
- No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall only apply to photochemically reactive material [35 IAC 215.301].

7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected engine test cells not being subject to 35 IAC 212.321 or 212.322 because due to the unique nature of this process, such rules cannot reasonably be applied.
- b. The affected engine test cells are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM₁₀, as identified in 35 IAC 212.324(a) (1).
- c. The affected engine test cells are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected engine test cells are not by definition fuel combustion emission units.
- d. The affected engine test cells are not subject to 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources in major metropolitan areas, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected engine test cells are not by definition fuel combustion emission units.
- e. This permit is issued based on the affected engine test cells not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected engine test cells do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.2.5 Operational and Production Limits and Work Practices

Except as provided in Condition 7.2.11, the affected engine test cells shall only be operated with natural gas, propane, or distillate fuel oil as the fuels.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected engine test cells are subject to the following:

- a. i. Emissions of particulate matter (PM), sulfur dioxide (SO₂), nitrogen oxides (NO_x), volatile organic material (VOM), and carbon monoxide (CO) from the 26 L-5 test cells shall not exceed 12.2, 42.0, 292.0, 9.7, and 73.0 tons/year, respectively. These limits are based on the utilization of the factor 0.085 for the test cells (the statistical maximum). The emission factor is based upon 24 hour per day operation and tests using varied types of engines and situations.
- ii. The above limitations were established in Permit C7905003, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].
- b. i. Emissions from the ten (10) alternative fuel testing cells shall not exceed the following limits:

<u>Pollutant</u>	<u>(Ton/Year)</u>
CO	1.08
NO _x	0.36
PM (PM ₁₀)	0.04
SO ₂	0.90
VOM	1.08
Total HAPs (e.g., Formaldehyde, etc.)	0.14

These limits are based on the potential emissions of the ten (10) alternative fuel testing cells burning fuels which will have 20% lower emissions than if the engines burned natural gas.

- ii. The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions from the ten (10) alternative fuel testing cells below the levels that would

trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

- iii. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the CAA from the ten (10) alternative fuel testing cells shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions from the ten (10) alternative fuel testing cells not triggering the requirements of Section 112(g) of the CAA.
- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.2.7 Testing Requirements

- a. Upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 IAC Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA [35 IAC 212.110(c)].
- b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR part 60, Appendix A, and 35 IAC 212.109, so as to demonstrate compliance with the emission limits in Condition 7.2.3(b).

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected engine test cell to demonstrate compliance with Conditions 5.5.1, 7.2.3, and 7.2.6 pursuant to Section 39.5(7)(b) of the Act:

- a. Pursuant to 35 IAC 212.110(e) and Section 39.5(7)(e) of the Act, the owner or operator of an emission unit

subject 35 IAC Part 212 shall retain records of all tests which are performed. These records shall be retained for at least five (5) years after the date a test is performed and shall include the following:

- i. The date, place and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- b. Distillate fuel oil usage for the affected engine test cells, gal/mo and gal/yr;
 - c. Natural gas fuel consumption for the affected engine test cells, therms/mo, and therms/yr;
 - d. Propane fuel consumption for the affected engine test cells, gal/mo and gal/yr;
 - e. The types and quantities of alternative fuels combusted;
 - f. The operating schedule of the 10 alternative fuel testing cells;
 - g. The engine test load of each of the 10 alternative fuel testing cells; and
 - h. Monthly and annual aggregate CO, NO_x, PM, SO₂, VOM, and HAP emissions from the affected engine test cells shall be maintained, based on the type of fuel, the fuel usage of the affected engine test cells and the applicable emission factors, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected engine test cell with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. A person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from Condition 7.2.7 (see also 35 IAC 212.110) that will be used [35 IAC 212.110(d)].
- b. The use of any fuel other than the fuels specified in Condition 7.2.5 or allowed by Condition 7.2.11 with the length of time this fuel was used and the effect on emissions within 30 days of this violation being detected.
- c. Emissions from the 26 L-5 engine test cells in excess of the limits in Condition 7.2.6(a) within 30 days of a record showing such an occurrence.
- d. Emissions from the 10 alternative fuel engine test cells in excess of the limits in Condition 7.2.6(b) within 30 days of a record showing such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected engine test cells without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of "alternative fuels" (alternative being anything other than diesel, natural gas or propane) in the ten (10) alternative fuel testing cells, provided that the Permittee continues to comply with Conditions 5.5.1, 7.2.3, and 7.2.6 this permit.

7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

- a. Compliance with Conditions 7.2.3(c) and (d) is assumed by the work-practices inherent in operation of natural gas/distillate oil-fired engine test cells.

- b. To determine compliance with Conditions 5.5.1 and 7.2.6(a), emissions from the affected engine test cells shall be calculated based on the following emission factors:

i. Natural Gas-Fired Engines:

<u>Pollutant</u>	<u>Emission Factor (lb/gal)</u>
CO	0.102
NO _x	0.037
PM	0.004
SO ₂	0.082
VOM	0.102

These are the emission factors for uncontrolled natural gas reciprocating industrial engines, facility engineering data.

Engine Test Cell Emissions (lb) = (Natural Gas Consumed, Therms) x (100 ft³/Therm) x (1 Mft³/1,000,000 ft³) x (The Appropriate Emission Factor, lb/Mft³)

ii. Diesel Fuel-Fired Engines:

Diesel:

<u>Pollutant</u>	<u>Emission Factor (lb/gal)</u>
CO	0.046
NO _x	0.241
PM	0.005
SO ₂	0.008
VOM	0.008

F173 (Comp Fuel):

<u>Pollutant</u>	<u>Emission Factor (lb/gal)</u>
CO	0.077
NO _x	0.042
PM	0.006
SO ₂	0.006
VOM	0.004

These are the emission factors for uncontrolled diesel/kerosene reciprocating engine testing, facility engineering data.

Engine Test Cell Emissions (lb) = (Distillate Fuel Oil Consumed, gal) x (The Appropriate Emission Factor, lb/1000 gal)

iii. Propane Fired Engines:

<u>Pollutant</u>	<u>Emission Factor (lb/gal)</u>
CO	129.0
NO _x	139.0
PM	5.0
SO ₂	0.35
VOM	83.0

These are the emission factors for Liquefied Petroleum Gas (LPG) fired Industrial Internal Combustion Engines (SCC #20201001), from AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants, March, 1990.

Engine Test Cell Emissions (lb) = (Propane Fuel Consumed, gal) x (The Appropriate Emission Factor, lb/1000 gal)

iv. Alternative Fuel-Fired Engines:

A. NO_x, SO₂, and VOM/HAP Emissions:

<u>Pollutant</u>	<u>Emission Factor (lb/hp-hr)</u>
NO _x	2.12 x 10 ⁻²
SO ₂	3.06 x 10 ⁻⁶
VOM	7.67 x 10 ⁻⁴
Total HAPs	7.67 x 10 ⁻⁴

These emission factors represent 80% of the uncontrolled emission factors for 4-stroke lean-burn natural gas reciprocating engines from Table 3.2-2 of AP-42, Volume I, Fifth Edition, Supplement F, August, 2000. These factors were converted from lb/mmBtu to lb/hp-hr using a conversion of 6,500 Btu/hp hr.

B. CO, and PM (PM₁₀) Emissions:

<u>Pollutant</u>	<u>Emission Factor (lb/hp-hr)</u>
CO	1.15 x 10 ⁻²
PM (PM ₁₀)	4.94 x 10 ⁻⁵

These emission factors represent 80% of the uncontrolled emission factors for 4-stroke rich-burn natural gas reciprocating engines from Table 3.2-3 of AP-42, Volume I, Fifth Edition, Supplement F, August, 2000. These factors were converted from lb/mmBtu to lb/hp-hr using a conversion of 6,500 Btu/hp hr.

Alternative Fuel Engine Test Cell
Emissions (lb) = (Operating Hours, hr) x
(Engine Load, hp) x (The Appropriate
Emission Factor, lb/hp-hr)

7.3 Units Peak Shavers Peak Shaver Generators

7.3.1 Description

This cogeneration system is used to supply electricity to the plant during the peak operating hours and for emergency purposes when the facility experiences a loss of electrical service from the public utility company. The system consists of two diesel reciprocating engines each producing 2,144 hp and one diesel engine producing 1,420 hp.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Peak Shavers	Two 2,144 hp and One 1,420 hp Diesel-Fired Reciprocating Engines/Generators	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. The Peak Shaver Generators are "affected generators" for the purpose of these unit-specific conditions.
- b. Each affected generator is subject to the emission limits identified in Condition 5.2.2.
- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].
- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall only apply to photochemically reactive material [35 IAC 215.301].

7.3.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected generators not being subject to 35 IAC 212.321 or 212.322 because due to the unique nature of this process, such rules cannot reasonably be applied.
- b. The affected generators are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM₁₀, as identified in 35 IAC 212.324(a)(1).

- c. The affected generators are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected generators are not by definition fuel combustion emission units.
- d. The affected generators are not subject to 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources in major metropolitan areas, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected generators are not by definition fuel combustion emission units.
- e. This permit is issued based on the affected generators not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected engines do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Operational and Production Limits and Work Practices

The affected generators shall only be operated with distillate fuel oil as the fuel.

7.3.6 Emission Limitations

There are no specific emission limitations for these units, however, there are source wide emission limitations in Condition 5.5 that include these units.

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected generator to demonstrate compliance with Conditions 5.5.1 and 7.3.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Distillate fuel oil usage for the affected generators, gal/mo and gal/yr; and
- b. Monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected generators shall be maintained, based on the type of fuel, the fuel usage

of the affected engine test cells and the applicable emission factors, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected generator with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

The use of any fuel other than the fuels specified in Condition 7.3.5 with the length of time this fuel was used and the effect on emissions within 30 days of this violation being detected.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

- a. Compliance with Conditions 7.3.3(c) and (d) is assumed by the work-practices inherent in operation of distillate oil-fired generators.
- b. To determine compliance with Condition 5.5.1, emissions from the affected generators shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/1000 gal)</u>
NO _x	469.0
PM	33.5
SO ₂	31.2
VOM	32.1

These are the emission factors for Internal Combustion Industrial Distillate Oil (Diesel) Reciprocating Cogeneration Engines (SCC #20200104), FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants, August, 1995.

Generator Emissions (lb) = (Distillate Fuel Oil Consumed, gal) x (The Appropriate Emission Factor, lb/1000 gal)

7.4 Unit P-006 Welding Operations

7.4.1 Description

Emissions from the welding operations are the result of fume generation from the consumption of weld wire.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
P-006	Mig Welding Operation of Metal Parts	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. The Mig Welding Operations are an "affected welding operation" for the purpose of these unit-specific conditions.
- b. The affected welding operation is subject to the emission limits identified in Condition 5.2.2.
- c. The affected welding operation is subject to 35 IAC 212.321(a), which provides that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].
 - ii. Because the expected process weight rate for the affected welding operation is less than 100 pounds per hour, the allowable PM emission rate for the affected welding operation set by 35 IAC 212.321 is 0.55 pounds per hour.

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected welding operation is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM₁₀, as identified in 35 IAC 212.324(a)(1).
- b. This permit is issued based on the affected welding operation not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major

Stationary Sources, because the affected welding operating does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Operational and Production Limits and Work Practices

None

7.4.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.4.7 Testing Requirements

- a. Pursuant to 35 IAC 212.110 and Section 39.5(7) (b) of the Act, testing for PM emissions shall be performed as follows:
 - i. Measurement of particulate matter emissions from stationary emission units subject to 35 IAC Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E [35 IAC 212.110(a)].
 - ii. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4 [35 IAC 212.110(b)].
 - iii. Upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 IAC Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA [35 IAC 212.110(c)].
- b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7) (d) of the Act, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR part 60, Appendix A, and 35 IAC 212.109, so as to demonstrate compliance with the emission limits in Condition 7.4.3(b).

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected welding operation to demonstrate compliance with Conditions 5.5.1 and 7.4.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Pursuant to 35 IAC 212.110(e) and Section 39.5(7)(e) of the Act, the owner or operator of an emission unit subject 35 IAC Part 212 shall retain records of all tests which are performed. These records shall be retained for at least five (5) years after the date a test is performed and shall include the following:
 - i. The date, place and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- b. Welding wire usage for the affected welding operation, lb/mo and ton/yr;
- c. The operating schedule for the affected welding operation; and
- d. The aggregate monthly and annual PM emissions from the affected welding operation based on the welding wire usage and the applicable emission factors, with supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected welding operation with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

None

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

To determine compliance with Conditions 5.5.1 and 7.4.3(c), PM emissions from the affected welding operating shall be calculated based on the use emission factors from Table 12.19-1 of AP-42, Volume I, Fifth Edition, January, 1995.

PM Emissions (lb) = (Welding Wire or Electrode Usage, lb) x (The Appropriate Emission Factor, lb PM/10³ lb Electrode Consumed)

7.5 Unit P-007 Gasoline Storage Tank

7.5.1 Description

Tank #8 is a 10,080 gallon above round tank for the storage of gasoline for use in various plant vehicles.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
P-007	Gasoline Tank #8 (10,080 gallons)	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. Gasoline Tank #8 is an "affected tank" for the purpose of these unit-specific conditions.
- b. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b) (2) [35 IAC 215.122(b)].
- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall only apply to photochemically reactive material [35 IAC 215.301].
- d. Pursuant to 35 IAC 215.583(a), no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing operation unless:
 - i. The tank is equipped with a submerged loading pipe [35 IAC 215.583(a)(1)]; and
 - ii. Pursuant to 35 IAC 215.583(a)(2), the vapors displaced from the storage tank during filling are processed by a vapor control system that includes one or more of the following:
 - A. A vapor collection system that meets the requirements of Condition 7.5.5(c) (see

also 35 IAC 215.583(d)(4)) [35 IAC 215.583(a)(2)(A)]; or

- B. A refrigeration-condensation system or any other system approved by the Illinois EPA that recovers at least 90 percent by weight of all vaporized organic material from the equipment being controlled [35 IAC 215.583(a)(2)(B)]; and
- C. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 215.584(b) or (d) [35 IAC 215.583(a)(2)(C)].

7.5.4 Non-Applicability of Regulations of Concern

- a. The affected tank is not subject to the NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60 Subpart Kb, because the affected tank was constructed prior to 1984.
- b. The affected tank is not subject to the requirements of 35 IAC 215.123, Petroleum Liquid Storage Tanks, pursuant to 35 IAC 215.123(a)(2), which exempts storage tanks with a capacity less than 151.42 m³.

7.5.5 Operational and Production Limits and Work Practices

- a. The affected tank shall only be used for the storage of gasoline.
- b. Pursuant to 35 IAC 215.583(c), each owner of a gasoline dispensing operation shall:
 - i. Install all control systems and make all process modifications required by Condition 7.5.3(d) (see also 35 IAC 215.583(a)) [35 IAC 215.583(c)(1)];
 - ii. Provide instructions to the operator of the gasoline dispensing operation describing necessary maintenance operations and procedures for prompt notification of the owner in case of any malfunction of a vapor control system [35 IAC 215.583(c)(2)]; and
 - iii. Repair, replace or modify any worn out or malfunctioning component or element of design [35 IAC 215.583(c)(3)].

- c. Pursuant to 35 IAC 215.583(d), each operator of a gasoline dispensing operation shall:
- i. Maintain and operate each vapor control system in accordance with the owner's instructions [35 IAC 215.583(d) (1)];
 - ii. Promptly notify the owner of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system [35 IAC 215.583(d) (2)];
 - iii. Maintain gauges, meters or other specified testing devices in proper working order [35 IAC 215.583(d) (3)]; and
 - iv. Pursuant to 35 IAC 215.583(d) (4), operate the vapor collection system and delivery vessel unloading points in a manner that prevents:
 - A. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B [35 IAC 215.583(d) (4) (A)]; and
 - B. Avoidable leaks of liquid during the filling of storage tanks [35 IAC 215.583(d) (4) (B)].

7.5.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.5.7 Testing Requirements

Within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, repair and retest a vapor collection system which exceeds the limits of Condition 7.5.5(c) (iv) (A) (see also 35 IAC 215.583(d) (4) (A)) [35 IAC 215.583(d) (5)].

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items

for the affected tank to demonstrate compliance with Conditions 5.5.1, 7.5.3, and 7.5.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of the affected tank pursuant to Condition 7.5.7, which include the following [Section 39.5(7)(e) of the Act]:
 - i. The date, place and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- b. Design information for the tank showing the presence of a permanent submerged loading pipe;
- c. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe;
- d. The throughput of the affected tank, gal/mo and gal/yr; and
- e. The monthly and aggregate annual VOM emissions from the affected tank based on the material stored, the tank throughput, and the applicable emission factors and formulas with supporting calculations.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Any storage of VOL in an affected tank that is not in compliance with the requirements of Conditions 7.5.3(b) and (d)(i) (see also 35 IAC 215.122(b) and 215.583(a)(1)), e.g., no "permanent submerged loading pipe," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-

compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance;

- b. Any storage of VOL in an affected tank that is out of compliance with the requirements of Conditions 7.5.3(b) and (d)(i) (see also 35 IAC 215.122(b) and 215.583(a)(1)) due to damage, deterioration, or other condition of the loading pipe, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance;
- c. The storage of any VOL or VPL other than the material specified in Condition 7.5.5(a) within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

For the purpose of estimating VOM emissions from the affected tanks to determine compliance with Conditions 5.5.1 and 7.5.3(c), Versions 3.1 or 4.0 of the TANKS program are acceptable.

7.6 Unit P-008 Rotoblast Operation
Control C-008 Dust Collector

7.6.1 Description

The rotoblast operation is used to remove rust from castings that have been in storage prior to machining. The parts are manually loaded into the machine and shot is sprayed on the parts to remove the rust.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
P-008	Pangborn Corporation Model 140-2RG-3 Rotoblast Table	Dust Collector C-008

7.6.3 Applicability Provisions and Applicable Regulations

- a. The rotoblast operation is an "affected shot blast" for the purpose of these unit-specific conditions.
- b. The affected shot blast is subject to the emission limits identified in Condition 5.2.2.

7.6.4 Non-Applicability of Regulations of Concern

- a. Pursuant to 35 IAC 212.681(c), 35 IAC 212.321, Particulate Matter from Process Emission Units, shall not apply to shot blasting.
- b. The affected shot blast is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM₁₀, as identified in 35 IAC 212.324(a)(1).

7.6.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the dust collector, including periodic inspection, routine maintenance and prompt repair of defects.

7.6.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.6.7 Testing Requirements

Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR part 60, Appendix A, and 35 IAC 212.109, so as to

demonstrate compliance with the emission limits in Condition 7.6.3(b).

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected shot blast to demonstrate compliance with Conditions 5.5.1 and 7.6.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of the opacity of the affected shot blast pursuant to Condition 7.6.7, which include the following [Section 39.5(7)(e) of the Act]:
 - i. The date, place and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- b. Records addressing use of good operating practices for the dust collector:
 - i. Records for periodic inspection of the dust collector with date, individual performing the inspection, and nature of inspection; and
 - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- c. Shot usage of the affected shot blast, lb/mo and ton/yr;
- d. The operating schedule of the affected shot blast; and
- e. The aggregate monthly and annual PM emissions from the affected shot blast based on the shot usage,

operating schedule, and the typical hourly emission rate, with supporting calculations.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected shot blast with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

None

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

To determine compliance with Condition 5.5.1, emissions from the affected shot blast shall be calculated based on the following:

$$\text{PM (lb)} = (\text{Shot Usage, lb}) \times [1 - (\text{Dust Collector Efficiency}^* (\%)/100)]$$

* As specified by manufacturer or vendor of the Dust Collector.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after January 31, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs applicable to this source that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

- 9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].
- 9.1.2 In particular, this permit does not alter or affect the following:
 - a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
 - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more

frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Emissions of Particulate Matter from New Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

Where:

P = Process weight rate; and
E = Allowable emission rate; and,

- i. Up to process weight rates of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

- c. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
 - Do not violate any applicable requirement;
 - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.
	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?
	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:
BY:	

	AUTHORIZED SIGNATURE

	TYPED OR PRINTED NAME OF SIGNATORY
	_____ / _____ / _____
	TITLE OF SIGNATORY
	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.5 Attachment 5 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7.
 - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked

yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

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Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

LAK:psj